

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER MDL NO. 19-2875 (RBK)

CERTIFICATION OF ADAM M. SLATER IN FURTHER SUPPORT OF
PLAINTIFFS' *DAUBERT* MOTION TO PRECLUDE
THE OPINIONS OF DEFENSE EXPERT ALI AFNAN, PH.D.

ADAM M. SLATER, hereby certify as follows:

1. I am an attorney at law within the State of New Jersey and a partner with the law firm of Mazie Slater Katz & Freeman, LLC, and serve as Plaintiffs' Co-Lead Counsel. I am fully familiar with the facts and circumstances of these actions. I make this Certification in further support of Plaintiffs' motion to exclude the testimony of Defense Expert Ali Afnan, Ph.D.
2. Attached hereto as **Exhibit 33** is a true and accurate copy of Dr. Susan Bain's October 31, 2022 Expert Report in this case.
3. Attached hereto as **Exhibit 34** is a true and accurate copy of Dr. Stephen Hecht's July 6, 2021 Expert Report in this case.
4. Attached hereto as **Exhibit 35** is a true and accurate copy of Dr. Stephen Hecht's October 31, 2022 Expert Report in this case.
5. Attached hereto as **Exhibit 36** is a true and accurate copy of the transcript of the January 13, 2023 deposition of Dr. Stephen Hecht in this case.

6. Attached hereto as **Exhibit 37** is a true and accurate copy of the January 31, 2023 deposition of Dr. Susan Bain in this case.

7. Attached hereto as **Exhibit 38** is a true and accurate copy of FDA, *About Warning and Close-Out Letters*.

8. Attached hereto as **Exhibit 39** is a true and accurate copy of ZMP-023.03, including an English translation, ZHP00000417.

MAZIE SLATER KATZ & FREEMAN, LLC
Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: April 25, 2023